

[COUNSEL LISTED ON FOLLOWING PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS, a California non-profit corporation; and
ENVIRONMENTAL PROTECTION
INFORMATION CENTER, a California non-profit
corporation;

Plaintiffs,

v.

EVERGREEN PULP INC.,

Defendant.

) Case No. CIV 06-00002 EDL
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER REGARDING PRIVILEGE**
) **LOG**
)
) Judge: Magistrate Judge Laporte
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26 EVERGREEN PULP, INC.

- 1 A. WHEREAS, pursuant to the Court's order of May 11, 2006, plaintiffs Californians for
2 Alternatives to Toxics and The Environmental Protection Information Center (collectively
3 "Plaintiffs") and Defendant Evergreen Pulp, Inc. ("Evergreen"), collectively, the "Parties," must
4 prepare and produce privilege logs "no later than 14 days after discovery responses are due,
5 unless the Court orders otherwise in a particular case."
- 6 B. WHEREAS, on May 17, 2006, Evergreen responded to Plaintiffs first set of requests for
7 production of documents, which response was due on May 18, 2006. Evergreen's privilege log
8 associated with the response is therefore required to be produced on or before June 1, 2006.
- 9 C. WHEREAS, the Parties have agreed and stipulate that Evergreen may have until June 15,
10 2006 to produce the privilege log associated with Evergreen's response to Plaintiffs first set of
11 requests for production of documents.

12 Respectfully submitted,

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19 ///

1 Dated: May 30, 2006

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10 By: /s/ William Verick

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15 Dated: May 30, 2006

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21 By: /s/ David D. Cooke

22 DAVID D. COOKE
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24 Evergreen Pulp, Inc.

25 Attestation Regarding Signature: This document is being filed electronically under my User ID and
26 Password. Pursuant to General Order 45, Section X.B, I hereby attest that concurrence in this filing of
this document has been obtained from each of the other signatories to this document.

I declare under penalty of perjury under the laws of the United States that the foregoing is true
and correct. Dated May 30, 2006, in San Francisco, California.

/s/ David D. Cooke

DAVID D. COOKE

[~~PROPOSED~~] ORDER

Based upon the stipulation of the Parties herein, it is hereby ordered that defendant Evergreen Pulp, Inc. ("Evergreen") may have until June 15, 2006 to produce the privilege log associated with Evergreen's response to the first set of requests for production of documents of plaintiffs Californians for Alternatives to Toxics and The Environmental Protection Information Center.

Dated: May 31, 2006

IT IS SO ORDERED
Elizabeth D. Laporte
Judge Elizabeth D. Laporte
HON. ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF CALIFORNIA